



# Department of Pesticide Regulation



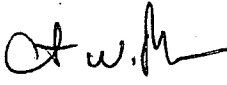
Mary-Ann Warmerdam  
Director

## MEMORANDUM

Arnold Schwarzenegger  
Governor

TO: Chuck Andrews, Associate Director  
Pesticide Programs Division

Marylou Verder-Carlos, Assistant Director  
Pesticide Programs Division

FROM: Christopher Reardon   
Chief Deputy Director  
916-445-4000

DATE: January 29, 2010

### SUBJECT: METHYL BROMIDE REGULATIONS RISK MANAGEMENT DECISION

On January 21, 2010, I received your memorandum outlining mitigation measures that would achieve the various regulatory target levels for bystander and occupational exposures to methyl bromide contained in my risk management directive of September 21, 2010.

Based on those mitigation measures, the Methyl Bromide Regulations Work Group members should develop proposed regulatory language to revise the current methyl bromide regulations to implement mitigation to meet the following regulatory target levels:

- Occupational exposure. The risk management decision regulatory target level for workers will be 13 parts per billion (ppb); therefore, work hours will be calculated for 13 ppb.
- Bystander exposure. The regulatory target level will be 5 ppb, with township caps calculated at 171,625 pounds per township, per month. This level should be stated in the revised language of the regulations.
- The township cap will be enforced via permit conditions using one or a combination of the "track and stop use" and "allocation," as stated in your January 21, 2010, memorandum.
- Develop regulatory language to clarify existing requirements in Title 3, California Code of Regulations sections 6447.2(a) and 6784(b)(2)(C).

The work group should develop these regulations and coordinate directly with Chief Counsel Polly Frenkel, and Regulations Coordinator Linda Irokawa-Otani.

cc: Polly Frenkel  
Linda Irokawa-Otani

